



Deny the Buckingham Compressor Station air permit

1 message

Eugenia Anderson-Ellis <Eandersonellis@gmail.com>

Mon, Sep 17, 2018 at 6:01 PM

Reply-To: Eandersonellis@gmail.com

To: airdivision1@deq.virginia.gov

Director of Publ

State Air Pollution Control Board
c/o Ann Regn, Director of Public Information and Outreach
Virginia Department of Environmental Quality
Phone: 804-698-4442
Email: airdivision1@deq.virginia.gov
Fax: 804-527-5106

Dear members of the Air Pollution Control Board,

Please deny the air permit for the Atlantic Coast Pipeline's Buckingham Compressor Station. It is not a minor source of air pollution, and it would become a major source of noise pollution for the area!

This compressor station poses a direct threat to our climate, our air quality, and - most importantly - to the lives of the historic freedman and largely African American Union Hill community. If built, the compressor station would emit methane, nitrogen oxides, volatile organic compounds and particulate matter into the air in close range to community members' homes and would be a stark example of environmental racism at play in the Commonwealth.

I ask that you deny this permit and request that the following concerns be addressed:

- DEQ and the Air Board must ensure that the permit for the Buckingham Compressor Station does not disproportionately impact marginalized communities. However, the vast majority of residents in close proximity to the proposed compressor station site - 85% - are people of color, and a large proportion are elderly or very young. Therefore, a disproportionate impact on an environmental justice community is virtually guaranteed. If the project cannot be modified to avoid this outcome, the air permit should be denied.
- ACP has not shown that the amount of toxic air emissions from the compressor will not cause or contribute to the endangerment of human health. DEQ should conduct a baseline Health Impact Assessment to better understand what ailments already exist in the community that could be exacerbated by these emissions. The elderly, very young, and community members who already have respiratory health issues are particularly at risk.
- DEQ should require ACP to continuously monitor nitrogen oxide emissions to ensure ACP is complying with the nitrogen oxide emissions limits at all operating periods. The currently proposed stack testing is not sufficient to ensure compliance with the draft permit conditions.

Sincerely,
Eugenia Anderson-Ellis

Eugenia Anderson-Ellis
2702 E. Grace St.
Richmond, VA 23223
804-643-3915

Buckingham Compressor Station Permit

1 message

Pam Burbul <burbulingsilence@yahoo.com>

Mon, Sep 17, 2018 at 8:29 PM

To: airdivision1@deq.virginia.gov

I am writing to urge you **not** to grant the permit for the Atlantic Coast Pipeline compressor station in Buckingham County. The pipeline and compressor station are hazardous to the health of local residents and all Virginians for several reasons:

- other similar pipelines have been shown to leach methane which can cause respiratory problems for people living nearby
- methane is a much more potent greenhouse gas than carbon dioxide and will therefore increase greenhouse gas emissions for the state of Virginia, thereby negatively affecting air quality for all Virginians.

The Atlantic Coast and Mountain Valley pipelines have been shown to be unnecessary. The benefits of allowing construction of the ACP and the compressor station to go forward would be short-term profits for already wealthy corporations, while the negative consequences would be long-term health problems for people, wildlife, and the natural environment.

Please do the right thing and vote NO on the permit for the compressor station in Buckingham County. Current and future generations will thank you.

Thank you,
Pam Burbul
[2713 Soapstone Dr](#)
[Reston, VA 20191](#)
[703-463-0477](#)

ACP- buckingham

1 message

Loman Frazier <lafrapie@gmail.com>

Mon, Sep 17, 2018 at 7:41 PM

To: airdivision1@deq.virginia.gov

We do not need or want this pipeline to go through. The winners are only corporate powers profit. Losers is the environment.

Thank you
Loman Frazier

Sent from my iPhone



Air Division 1, rr <airdivision1@deq.virginia.gov>

Public Comment: I Oppose the Buckingham Compressor Station Air Permit1 message

mllwood@live.com <mllwood@live.com>

Mon, Sep 17, 2018 at 11:53 AM

Reply-To: mllwood@live.com

To: airdivision1@deq.virginia.gov

Dear Ms:

I'm writing today to urge the Air Pollution Control Board to reject the proposed permit for Dominion Energy's Buckingham Compressor Station.

This facility is a threat to our climate, public health and public safety, and the Board has an obligation to protect Virginians' clean air at all costs.

A vote to allow operation of this facility is a vote to expose residents of Union Hill to nearly 140 tons per year of harmful chemical emissions; it is a vote to increase climate disrupting greenhouse gas emissions at a time when Virginia is moving to decrease climate impacts from the power sector; and it is a vote to put Buckingham County in a blast zone.

Virginia doesn't need the Atlantic Coast Pipeline and we don't need this compressor station. I urge the Board to deny this and any future permits that come before you.

Sincerely,

Lucy Higgins
7712 bRYN MAWR RD
Henrico, VA 23229-6604



Air Division 1, rr <airdivision1@deq.virginia.gov>

Air Permit, Buckingham Compressor Station

1 message

Natalie Pien <natcpien1@gmail.com>

Mon, Sep 17, 2018 at 11:24 AM

To: airdivision1@deq.virginia.gov

Cc: michael.dowd@deq.virginia.gov, patrick.corbett@deq.virginia.gov

Hello, my comments regarding are attached below.

Natalie Pien
20644 Gleedsville Rd
Leesburg, VA 20175
703 963 3573



9-11-18 Buckingham County Compressor Station Comments to the Air Board.docx

123K

Comments to the Air Board
Re: Union Hill Compressor Station
Natalie Pien
20644 Gleedsville Rd.
Leesburg, VA 20175
703 963 3573

Unitarian Universalists Church of Loudoun, Green Team Chair
Sierra Club, Great Falls Group, Conservation Co-Chair
350 Loudoun, Activist/Organizer

First, thank you for extending the comment period by 10 days. However, to be fair and transparent, the comment period must be extended a full 60 days.

Second, in reviewing the Air Permit, please keep in mind your duties:

“The Air Board, in approving permits, “shall consider facts and circumstances relevant to the reasonableness of the activity involved,” including: [from Code of Virginia § 10.1-1307.E.]

1. The character and degree of injury to, or interference with, safety, health, or the reasonable use of property which is caused or threatened to be caused;
2. The social and economic value of the activity involved;
3. The suitability of the activity to the area in which it is located; and
4. The scientific and economic practicality of reducing or eliminating the discharge resulting from such activity.”

I urge you to deny the Air Permit application based on 2 broad concerns: the Dominion application is based on incorrect data; the application lacks critical reports. Supporting details are below.

1. Data used in the Dominion Energy application is incorrect and should invalidate the application:
 - a. The population density is greater than submitted. On the ground surveys by Dr. Lakshmi Fjord reveal that that actual population density is 600% higher population than Dominion’s 29.6 person per square mile density. This falsehood allows Dominion to us 75% thinner pipes, which benefits Dominion but dramatically increases the threat to the community.
 - b. Dominion’s own maps show a dense cluster 99 households on all sides of the proposed compressor station.
 - c. The community is only 17% white and has been subjected to past social injustices, being founded by Freedmen after Emancipation. The Governor’s Environmental Justice Committee recommends denial of the air permit. An EJ study was never completed in the permit process.
 - d. The proposed compressor station in Union Hill is a flagrant example of Racial Injustice. And, in N. Carolina, the ACP proposed compressor

station site is in a predominantly poor, Native American Community. Communities of color are not the only ones affected by ACP compressor station sites. In West VA, the compressor station is in a rural, poor white community where coal mines and now fracking is occurring. Social injustice abounds.

- e. The community is made up of high risk populations – 32% children, 25% elderly.
 - f. Contrary to DEQ's Air and Renewable Energy Director Mike Dowd's opinion, the Federal Energy Regulatory Commission, FERC, stated that if the Union Hill Community was densely populated by minorities, it would make a difference to the Federal Permit application.
 - g. The Air Board must act to uphold the intent of the FERC permit by denying the air permit due to falsification of information in the Dominion application that put the community at unacceptable risk.
2. Because the Union Hill Community was so mischaracterized by Dominion Power, the application lacks important studies and plans. These studies must be submitted and reviewed in a transparent manner with opportunity for public review and comment. In addition, Dominion's mischaracterization allowed skirting Federal requirements designed to protect the community. This context is critical. Protect the citizens of Union Hill.
- a. Comprehensive Health Impact Assessment (CHIA), also taking into account the existing Transco Pipeline.
 - i. Pre-existing health conditions in the community must be included.
 - ii. Ambient air standards that "smooth over" spikes in pollutant concentration cannot be used. Actual exposure, such as from leaks and deliberate release during "Blow Downs," must be used to develop an accurate CHIA.
 - iii. Is ambient air quality being monitored now to establish baseline conditions? If not, it must be implemented. All known pollutants must be monitored before construction.
 - b. Particulate Matter pollution is not adequately addressed both during construction and operation of the proposed compressor station.
 - c. An ACP/Dominion evacuation plan was not submitted with the application. Local emergency response does not have the resources or training to address compressor station accidents.
 - d. Long term study of the health impacts of long-term exposure to permitted noise levels of 55 dB.
 - e. Environmental Justice study for Union Hill.
 - f. Evaluation of alternative approaches for generating electricity, such as from renewable sources of energy.

Air Division 1, rr <airdivision1@deq.virginia.gov>

Deny the Buckingham Compressor Station air permit

1 message

Natalie Pien <natcpien1@gmail.com>

Mon, Sep 17, 2018 at 4:06 PM

Reply-To: natcpien1@gmail.com

To: airdivision1@deq.virginia.gov

Director of Publ

State Air Pollution Control Board
c/o Ann Regn, Director of Public Information and Outreach
Virginia Department of Environmental Quality
Phone: 804-698-4442
Email: airdivision1@deq.virginia.gov
Fax: 804-527-5106

Dear Director Paylor and members of the Air Pollution Control Board,

I respectfully urge you to deny the draft minor source air permit for the Atlantic Coast Pipeline's Buckingham Compressor Station.

This compressor station poses a direct threat to our climate, our air quality, and - most importantly - to the lives of the historic freedman and largely African American Union Hill community. If built, the compressor station would emit methane, nitrogen oxides, volatile organic compounds and particulate matter into the air in close range to community members' homes and would be a stark example of environmental racism at play in the Commonwealth.

We ask that you deny this permit and request that the following concerns be addressed:

- DEQ and the Air Board must ensure that the permit for the Buckingham Compressor Station does not disproportionately impact marginalized communities. However, the vast majority of residents in close proximity to the proposed compressor station site - 85% - are people of color, and a large proportion are elderly or very young. Therefore, a disproportionate impact on an environmental justice community is virtually guaranteed. If the project cannot be modified to avoid this outcome, the air permit should be denied.
- ACP has not shown that the amount of toxic air emissions from the compressor will not cause or contribute to the endangerment of human health. DEQ should conduct a baseline Health Impact Assessment to better understand what ailments already exist in the community that could be exacerbated by these emissions. The elderly, very young, and community members who already have respiratory health issues are particularly at risk.
- DEQ should require ACP to continuously monitor nitrogen oxide emissions to ensure ACP is complying with the nitrogen oxide emissions limits at all operating periods. The currently proposed stack testing is not sufficient to ensure compliance with the draft permit conditions.
- DEQ should conduct further analysis of the greenhouse gas emissions associated with this proposed compressor station. While Virginia is poised to begin regulating carbon dioxide emissions from electric power plants, ignoring the greenhouse gas emissions from the infrastructure used to supply those power plants is self-defeating. With each new pipeline and compressor station built, significant amounts of methane are emitted into the atmosphere, exacerbating climate change impacts. Though methane does not last in the atmosphere nearly as long as carbon dioxide, methane is much more efficient at capturing radiation than carbon dioxide and, pound for pound, the comparative impacts of methane to carbon dioxide are 25 times greater over a 100 year period. Greenhouse gas emissions are mentioned in the draft air permit, but further analysis of impacts and plans to mitigate those emissions are necessary.
- ACP has not adequately addressed emergency response plans. Detailed plans should be drafted and shared with the community. These plans should outline evacuation and actions in response to an explosion or other emergency at the Buckingham compressor station. At this time, there is no certainty that residents could be evacuated promptly, and Buckingham County emergency responders do not have the supplies or resources to respond to a significant industrial emergency.

9/25/2018

Commonwealth of Virginia Mail - Deny the Buckingham Compressor Station air permit

It is extremely important that the Air Pollution Control Board defend Union Hill, Buckingham County, and all Virginians' air and climate from the harmful impacts associated with this compressor station. I urge you to deny the permit.

Sincerely,

Natalie Pien
20644 Gleedsville Rd
Leesburg, VA 20175
7039633573

Katherine Rehak 9-14-2018 comments on 21599 Draft Permit/Engineering Analysis

1 message

Citizen Boards, rr <citizenboards@deq.virginia.gov>
To: rr Air Division 1 <airdivision1@deq.virginia.gov>

Mon, Sep 17, 2018 at 9:14 AM

----- Forwarded message -----

From: **Katherine Rehak** <k.rehak@hotmail.com>

Date: Fri, Sep 14, 2018 at 8:02 PM

Subject: RE: 21599 Draft Permit/Engineering Analysis

To: citizenboards@deq.virginia.gov <citizenboards@deq.virginia.gov>, ann.regn@deq.virginia.gov <ann.regn@deq.virginia.gov>

Cc: cindy.berndt@deq.virginia.gov <cindy.berndt@deq.virginia.gov>

Dear Ms. Regn and/or the Piedmont Regional Office,

Thank you for taking the time to address these concerns and/or for forwarding them to the correct address.

I have tried to determine if I am sending my comments to the correct address. It is very difficult to ascertain this from the Virginia DEQ website and my limited Internet access.

I have several questions regarding the proposed Atlantic Coastal Pipeline (ACP). I live, work, travel and recreate through many of the areas affected by the proposed pipeline.

- 1) Why do you not provide more time for public comment since impacted communities do not regularly have internet access to large permit documents that are stored as web files? Can you not provide summary tables or other educational materials to make content more accessible to impacted communities?
- 2) Why did the Federal Energy Regulatory Commission (FERC) and DEQ not use the actual numbers of homes and residents of Union Hill in BCS permitting applications?
- 3) Why are two of three ACP compressor stations in predominately African American neighborhoods and all three are in areas with disproportionately high poverty levels?
- 4) Farmers have reported a current gas leak in the existing Transco 4-pipeline corridor in Union Hill. Has Transco reported that leak to state agencies? How often have such leaks on the Transco occurred? Has the leak been addressed? Historically, pipeline leakage volumes exceed those of any other transportation provider (truck, rail, barge, etc.). How will ACP ensure the integrity/maintenance of its pipeline?
- 5) Local residents are concerned that Transco paid no liability or damages/fines directly to families whose homes were destroyed or damaged by the explosion in Appomattox County (next to Buckingham County). What protection will be provided to residents if the compressor station causes damage?
- 6) Buckingham County is a low medical-resource county. There is a clinic with a part-time doctor. Residents have to travel to Charlottesville or to Farmville -- long distances -- by ambulance in emergencies. Everyday healthcare requires driving long distances, at high costs, for this underserved, high poverty populations already. ACP/Dominion Energy denied a request by the Buckingham Planning Commission to set aside a bond to pay for the costs of health impacts from BCS. If the compressor station makes the local community sick or sicker, how will the state ensure residents get the needed health services?

I am sure there are many other concerns about this proposal. The consideration of these few noted above is much appreciated.

Sincerely,

K.M. Rehak
146 Longwood PI #102
Madison Heights, VA 24572
(434) 384-7870

